1 2 3 4 5 6	Michele R. Stafford, Esq. (SBN 172509) Adrian L. Canzoneri, Esq. (SBN 265168) SALTZMAN & JOHNSON LAW CORPORATION 44 Montgomery Street, Suite 2110 San Francisco, CA 94104 (415) 882-7900 (415) 882-9287 – Facsimile mstafford@sjlawcorp.com acanzoneri@sjlawcorp.com Attorneys for Plaintiffs		
7			
8	UNITED STATES DISTRICT COURT		
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
10	DISTRICT COUNCIL 16 NORTHERN	Case No.: C15-00669 MMC	
11	CALIFORNIA HEALTH AND WELFARE TRUST FUND, et al.,	PLAINTIFFS' REQUEST TO CONTINUE INITIAL CASE	
12	Plaintiffs,	MANAGEMENT CONFERENCE; [PROPOSED] ORDER THEREON	
13	V.		
14	INTEGRITY COMPANY, INC., dba INTEGRITY	Date: May 15, 2015 Time: 10:30 a.m.	
15	PAINTING, a California Corporation; JAMES S. BURNS, an Individual,	Dept: Ctrm. 7, 19 th Floor 450 Golden Gate Ave.	
16	Defendants.	San Francisco, CA 94102	
17		Honorable Maxine M. Chesney	
18	Plaintiffs respectfully request that the Initial Case Management Conference, currently on		
19	calendar for May 15, 2015, be continued for approximately ninety (90) days. Good cause exists for		
20	the granting of the continuance, as follows:		
21	1. As the Court's records will reflect, this action was filed on February 12, 2015 [Dkt.]		
22	No. 1]. Defendants were both personally served on April 26, 2015. Plaintiffs filed a Proof of Service		
23	of Summons with the Court, as to each Defendant, on May 7, 2015 [Dkt. Nos. 11-12].		
24	2. To date, Defendants have yet to respond	to the Complaint, or otherwise appear in this	
25	matter.		
26	3. There are no issues that need to be addre	ssed by the parties at the currently scheduled	
27	Initial Case Management Conference. In the interest of conserving costs, as well as the Court's time		
28	and resources, Plaintiffs respectfully request that the upcoming Case Management Conference be		
	PLAINTIFFS' REQUEST TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER THEREON – C15-00669 MMC		

P:\CLIENTS\PATCL\Integrity Painting\Pleadings\Request to Continue Initial Case Management Conference_5715.doc

1	continued for approximately ninety (90) days, to allow Defendants the opportunity to appear in this		
2	matter, or in the alternative, to allow Plaintiffs adequate time to pursue Defendants' default and		
3	subsequent default judgment.		
4	I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above		
5	entitled action, and that the foregoing is true of my own knowledge.		
6	Dated: May 7, 2015 SALTZMAN & JOHNSON		
7	Dated: May 7, 2015 SALTZMAN & JOHNSON LAW CORPORATION		
8			
9	By: Adrian L. Canzoneri		
10	Attorneys for Plaintiffs		
11	IT IS SO ORDERED.		
12	The Initial Case Management Conference currently set for May 15, 2015, is hereby		
13	continued to August 14, 2015 at 10:30 a.m., and all previously set		
14	deadlines and dates related to this case are continued accordingly.		
15	DATED: <u>May 8, 2015</u>		
16			
17	Mafine M. Cheken UNITED STATES DISTRICT COURT JUDGE		
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			